

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

IN RE: AME CHURCH EMPLOYEE
RETIREMENT FUND LITIGATION

MDL Docket No. 1:22-md-03035-STA-jay

ALL CASES

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT NEWPORT GROUP, INC.'S MOTION TO DISMISS PLAINTIFFS'
CONSOLIDATED AMENDED COMPLAINT**

COMES NOW Plaintiffs Reverend Pearce Ewing, Reverend Charles R. Jackson, Presiding Elder Cedric V. Alexander, Reverend Derrell Wade, Reverend Reuben J. Boyd, Presiding Elder Phillip Russ, IV, Reverend Marcius King, by and through Lynette Glenn, Power of Attorney, Reverend Matthew Ewing, Reverend A. Offord Carmichael, Jr., and Reverend Diane Conley, (collectively "Plaintiffs") and through their undersigned counsel respectfully request a 14-day extension of time, up to and including October 31, 2022, to respond to Defendant NEWPORT GROUP, INC.'S Motion to Dismiss Plaintiffs' Consolidated Amended Complaint.

**MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO DEFENDANT NEWPORT GROUP, INC.'S
MOTION TO DISMISS PLAINTIFFS' CONSOLIDATED AMENDED COMPLAINT**

1. On September 19, 2022, Defendant NEWPORT GROUP, INC.'S Motion to Dismiss Plaintiffs' Consolidated Amended Complaint (hereinafter "Newport's Motion").
2. Defendant Newport's counsel has consented to a 14-day extension for Plaintiffs to file their response to Newport's Motion on or by October 31, 2022.

3. As of the date of this unopposed Motion, Plaintiffs are still within the time permitted for filing a response to Newport's Motion.

4. Rule 6(b) of the Federal Rules of Civil Procedure provides in part that "[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires."

5. Plaintiffs require an extension of time to respond to Newport's Motion to account for upcoming conflicting deadlines in Plaintiffs' counsel's other matters.

6. Therefore, Plaintiffs respectfully request an additional 14 days, up to and including October 31, 2022, to respond to Newport's Motion.

7. Pursuant to Local Rule 3.01(g), counsel for Plaintiffs has conferred with Defendant Newport's counsel, who has consented to the relief requested in this Motion.

WHEREFORE, Plaintiffs respectfully request a 14-day extension of time, up to and including October 31, 2022, to respond Defendant NEWPORT GROUP, INC'S Motion to Dismiss Plaintiffs' Consolidated Amended Complaint.

Respectfully submitted this 14th day of October 2022.

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Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of October 2022, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day via transmission of Notices of Electronic Filing generated by CM/ECF on all counsel of record.

/s/ Gregorio A. Francis
Gregorio A. Francis, esq.